SCOTT A. WOLFSON (MI P53194) ANTHONY J. KOCHIS (MI P72020) Admitted *Pro Hac Vice* **WOLFSON BOLTON PLLC** 3150 Livernois Rd., Suite 275 Troy, MI 48083

Telephone: (248) 247-7103 Facsimile: (248) 247-7099

E-Mail: swolfson@wolfsonbolton.com

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

-----X

In re: : Chapter 11

:

GENERAL MOTORS CORPORATION, et al. : Case No. 09-50026 (REG)

:

Debtors. : (Jointly Administered)

-----X

## VERIFIED STATEMENT OF WOLFSON BOLTON PLLC PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019

Wolfson Bolton PLLC ("<u>WB</u>") submits this verified statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure ("<u>Verified Statement</u>") in connection with the above-captioned chapter 11 cases of Chrysler LLC, *et al.* (collectively, "<u>Debtors</u>"), and states as follows:

- 1. WB represents the following parties in interest with respect to the bankruptcy cases of the Debtors:
  - (a) Len Industries, Inc. ("<u>Len</u>") 815 Rice St. Leslie, MI 49251
  - (b) Guardian Industries, Corp. 2300 Harmon Rd. Auburn Hills, MI 48326
  - (c) SRG Global, Inc.c/o Guardian Industries Corp.2300 Harmon Rd.Auburn Hills, MI 48326

- (d) Guardian Automotive, Inc.c/o Guardian Industries Corp.2300 Harmon Rd.Auburn Hills, MI 48326
- (e) Guardian Automotive Products, Inc. c/o Guardian Industries Corp.2300 Harmon Rd.Auburn Hills, MI 48326
- (f) Ionian Corporationc/o Guardian Industries Corp.2300 Harmon Rd.Auburn Hills, MI 48326
- (g) Guardian Automotive Corporationc/o Guardian Industries Corp.2300 Harmon Rd.Auburn Hills, MI 48326
- (h) Guardian Automotive Trim, Inc.c/o Guardian Industries Corp.2300 Harmon Rd.Auburn Hills, MI 48326
- (i) Siegel-Robert Automotivec/o Guardian Industries Corp.2300 Harmon Rd.Auburn Hills, MI 48326
- (j) Siegel-Robert, Inc.c/o Guardian Industries Corp.2300 Harmon Rd.Auburn Hills, MI 48326
- (k) S-R of Kentucky, Inc.c/o Guardian Industries Corp.2300 Harmon Rd.Auburn Hills, MI 48326
- (l) Siegel-Robert Automotive (Suzhou) Co., Ltd. (parties in interest (b) through (l) are referred to collectively as the "Guardian Parties"). c/o Guardian Industries Corp.
  2300 Harmon Rd.
  Auburn Hills, MI 48326

- (m) NYX, Inc. 36800 Plymouth Rd. Livonia, MI 48150
- (n) Bates Acquisition, LLC (parties in interest (m) and (n) are referred to collectively as the "NYX Parties")
   38700 Plymouth Rd.
   Livonia, MI 48150
- 2. Each of these representations is a separate representation and not pursuant to a committee arrangement. Information about the claims and interests held by WB's clients may be filed in their respective proofs of claim, administrative claims, statements of interest, or other pleadings filed in the Debtors' chapter 11 cases.
- 3. Len, the Guardian Parties, and the NYX Parties are parties to a number of contracts with the Debtors, with obligations owing under the contracts as of the commencement of the Debtors' chapter 11 bankruptcy cases.
- 4. The amounts of the claims of Len, the Guardian Parties, and the NYX Parties against the Debtors have not been fully determined.
- 5. WB began representing Len, the Guardian Parties, and the NYX Parties in connection with the Debtors' bankruptcy cases in June 2009.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

6. The undersigned verifies under oath that this Verified Statement is true and accurate to the best of his knowledge and belief.

Respectfully Submitted,

WOLFSON BOLTON PLLC

Attorneys for Len, the Guardian Parties, and the NYX Parties

Dated: July 7, 2009 By: /s/ Scott A. Wolfson

Scott A. Wolfson (MI P53194) Anthony J. Kochis (MI P72020)

3150 Livernois Rd., Suite 275

Troy, MI 48083

Telephone: (248) 247-7103 Facsimile: (248) 247-7099

E-Mail: swolfson@wolfsonbolton.com